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October 10, 2017

Before the
Federal Communications Commission
Washington, D.C. 20554

Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49

Dear Chairman Pai, Commissioners Carr, Mingon, O'Rielly, and Rosenworcel:

The American Conservative Union recently weighed in on a rulemaking proposal on Vehicle-to-Vehicle communications technology, NHTSA-2016-0126-0009, which proposes to “establish a new Federal Motor Vehicle Safety Standard (FMVSS), No. 150, to mandate vehicle-to-vehicle (V2V) communications for new light vehicles and to standardize the message and format of V2V transmissions.”

ACU is urging the Department of Transportation to terminate the rulemaking proposal as it that imposes new government mandates, hinders innovation, harms intellectual property, and suppresses competition.

Having previously submitted the letter to Secretary Chao's office, we are now filing the letter with the FCC.

Sincerely,

Dan Schneider
Executive Director



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October 9, 2017

The Honorable Elaine L. Chao
Secretary
United States Department of Transportation
1200 New Jersey Ave. NW
Washington, DC 20590

Dear Secretary Chao,

On behalf of the American Conservative Union (ACU) and our membership around the country, we urge you to terminate a rulemaking proposal on Vehicle-to-Vehicle communications technology that imposes new government mandates, hinders innovation, harms intellectual property, and suppresses competition.

In December of 2016, in the final weeks of the Obama Presidency, the National Highway Traffic Safety Administration (NHTSA) issued a new rulemaking, NHTSA-2016-0126-0009, which proposes to “establish a new Federal Motor Vehicle Safety Standard (FMVSS), No. 150, to mandate vehicle-to-vehicle (V2V) communications for new light vehicles and to standardize the message and format of V2V transmissions.” The proposed rule, which mandates all light vehicles to use a specific and controversial technology, has received little public attention, but it would force companies to comply with new unnecessary and restrictive mandates that would hurt innovation. It will also impede private sector efforts to utilize new technologies to expand consumer choice in safety technologies.

Furthermore, the proposed rule would interfere with the efficient use of an important band of wireless spectrum, limiting innovative uses of the band that would broaden consumer choice in a number of areas well beyond V2V communications.

There is no reason for this Administration to add a new regulation that will mandate the use of an inferior government-selected technology and stunt the growth of innovative competitors. Doing so would be anti-market and anti-innovation. ACU strongly urges you to terminate NHTSA’s consideration of the proposed rule on V2V communications as soon as possible.

Sincerely,

Dan Schneider
Executive Director